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Nevada Bar No. 2566  
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4 2301 Palomino Lane  
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Attorney for Plaintiff  
7

8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 KATHRYN MAYORGA, an individual

Case No.: 2:19-cv-00168-JAD-DJA

11  
12 Plaintiff,

13 vs.

14 CRISTIANO RONALDO, individually,  
15 Does I-XX and Roe Corporations I-XX;  
16 Defendants.

17 **PLAINTIFF'S MOTION TO EXTEND TIME TO RESPOND**

18 **TO DEFENDANT'S MOTION FOR TERMINATING SANCTIONS [ECF 112]**

19 **(First Request)**

20  
21 COMES NOW Plaintiff, by and through her attorneys, STOVALL & ASSOCIATES, and  
22 files this motion to extend time to respond to defendant's motion for terminating sanctions [ECF  
23 112]. This is the first request for an extension of time made to the court.

24  
25 This motion is based upon the pleadings and papers on file herein, the memorandum of  
26 points and authorities attached hereto, and any oral argument this Court may entertain should  
27 there be a hearing on the motion.

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Case No.: 2:19-cv-00168-JAD-DJA  
Mayorga v. Ronaldo  
Motion to Extend time

Dated this 10 day of June 2021.

STOVALL & ASSOCIATES



LESLIE MARK STOVALL, ESQ.  
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Attorney for Plaintiff

**DECLARATION OF PLAINTIFF'S COUNSEL IN SUPPORT OF**  
**PLAINTIFF'S MOTION TO EXTEND TIME**

LESLIE MARK STOVALL, declares and states as follows:

1. I am the attorney of record for the plaintiff in this case.
2. On May 27, 2021 the defense filed an emergency motion for case terminating sanctions and to disqualify Stovall and Associates as counsel for the plaintiff [ECF 112].
3. On May 27, 2021 the defense filed a motion to seal [ECF 113].
4. That on June 1, 2021 the court issued a minute order that response and reply briefs are due in the ordinary course [ECF 114].
5. The plaintiff's responses to ECF 112 and ECF 113 are due on or before June 10, 2021 pursuant LR 7-2 (b).

- 1           6.       I am requesting an extension of time to file plaintiff's responses to ECF 112 and  
2                       ECF 113 because I have not been able to begin work on the responses since May  
3                       27, 2021 and I will not be able to start working on the responses until June 20,  
4                       2021 for the following reasons:
- 5                       a. I was preparing for the jury trial of *Barcelon v. Landforce*  
6                       Corporation, case no. 2:18-cv-01493-GMN-NJK from May 17, 2021  
7                       until June 4, 2021 when it settled.
- 8                       b. From June 5, 2021 thru June 11, 2021 I have been catching  
9                       up on work deferred from May 17, 2021 thru June 4, 2021,  
10                      including continuing the jury trials of *Ware v. Hardy*, case A-  
11                      18-786457 and *Ramirez v. Lucky Lucy Casino*, case A-18-  
12                      769806 in the Clark Co. District Court and preparing for the  
13                      jury trial of *Droge v. AAAA Towing*, case A-15-724188 in  
14                      Dept. 1 of the Clark Co. District Court commencing July 19,  
15                      2021.
- 16                      c. Prior to the filing of the defense motions ECF 112 and ECF  
17                      113, I had scheduled and paid for a short vacation in Florida to  
18                      visit my family from June 12, 2021 thru June 19, 2021. This is  
19                      the first occasion that I have had to visit my family due to  
20                      Covid – 19 restrictions since last year.
- 21           7.       The exhibits [ECF111] filed in support of the defendant's motion for terminating  
22                       sanctions [ECF 112] appear to be approx. 1500 pages. Based upon the allegations  
23                       set forth in the defense motions these exhibits and the "Football Leaks" document  
24                       require careful review and referencing to disclosures of documents attributable to  
25                       the defendant and the media prior to the filing of this lawsuit and thereafter, and  
26                       the disclosures by the plaintiff to law enforcement, the defendant and to the court  
27                       in this case.
- 28           8.       On June 8, 2021 I requested by email defense counsel's agreement to extend the  
                     time for the filing of plaintiff's response, a copy of which is attached hereto as  
                     *Exhibit 1* and incorporated herein by reference.

1           9.       On June 8, 2021 the defendant's counsel Kendelee Works responded to my  
2                   request stating:

3                   Les,

4  
5                   Your request for an additional 25 days after your return from  
6                   vacation to oppose these motions, both of which are due on  
7                   June 10, 2021, not the 11th, is entirely unreasonable. I will  
8                   also note that given your trial case settled on 6/4, I presume  
9                   for the past six days you have not been preparing for trial on a  
10                  case that had resolved. As to the 1000's of pages of exhibits,  
11                  those documents have all already been disclosed and are  
12                  primarily comprised of the LVMPD file that you indicated you  
13                  were reviewing in preparation for the Bongiovi depositions  
14                  last month, which then required you to continue those  
15                  depositions as well. Moreover, the LVMPD file consists  
16                  largely of your own client's statements to the police and the  
17                  Football Leaks documents you provided to LVMPD years ago.  
18                  Your request also runs afoul of the court's most recent orders  
19                  extending discovery and staying certain depositions and the  
20                  expert deadline.

21                  In short, your request that we agree to afford you 7 weeks to  
22                  oppose two motions for which you would be allowed 2 weeks  
23                  to respond in the ordinary course, is unreasonable and not well  
24                  founded. If you have a more reasonable request, we are happy  
25                  to consider it and can be available for a meet and confer  
26                  tomorrow.

27                  Please let us know how you wish to proceed.

28                  (A copy of Ms. Works email is attached hereto as *Exhibit 2* and  
                  incorporated herein by reference).

1           10.       I am requesting that the court extend the time for the filing of the plaintiff's  
2                   response to both EFC 112 to EFC 113 to July 20, 2021.

3           11.       This motion is made in good faith and not for propose of unnecessary delay.  
4                   I declare under penalty of perjury under the laws of Nevada that the foregoing is  
5                   true and correct.

Case No.: 2:19-cv-00168-JAD-DJA  
Mayorga v. Ronaldo  
Motion to Extend time

DATED this 10 day of June 2021.

  
\_\_\_\_\_  
LESLIE MARK STOVALL, ESQ.

### MEMORANDUM OF POINTS AND AUTHORITIES

FRCP 6(b) states:

When an act may or must be done within a specific time. The court may, for good cause, extend the time:

- (A) with or without motion or notice if the courts acts, or if a request is made, before the original time or its extension expires; or
- (B) on motion made after the time has expired if the party failed to act because of excusable neglect.

LRIA6-1 states in pertinent part:

- (a) A motion or stipulation to extend time must state the reasons for the extension requested and must inform the court of all previous extension of the subject deadline the court granted.
- (b) A stipulation or motion to seeking to extend the time to file an opposition or reply to a motion, or to extend the time fixed for hearing a motion, must state in its opening paragraph the filing date of the subject motion or the date of the subject hearing.

Based upon the declaration of counsel, good cause exists for the extension of plaintiff's time from June 10, 2021 to July 20, 2021 to respond to defendant's motion for sanctions [ECF 112].

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1 Case No.: 2:19-cv-00168-JAD-DJA  
2 Mayorga v. Ronaldo  
3 Motion to Extend time

4 DATED this 18 day of June 2021.

5 STOVALL & ASSOCIATES

6   
7 LESLIE MARK STOVALL, ESQ.  
8 Nevada Bar No. 2566  
9 ROSS MOYNIHAN, ESQ.  
10 Nevada Bar No. 11848  
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16 Attorney for Plaintiff  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 10<sup>th</sup> day of June 2021, service of the foregoing  
Plaintiff's Motion to Extend Time was made this date through the court's electronic filing system  
to the following:

Christiansen Trial Lawyers  
710 South 7th Street, Suite B  
Las Vegas, NV 89101  
Phone (702) 240-7979  
Fax (866) 412-6992  
Attorneys for the defendant

/s/ Maria Hernandez  
An employee of STOVALL & ASSOCIATES

# **EXHIBIT 1**



## **Les Stovall**

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**From:** Les Stovall  
**Sent:** Tuesday, June 8, 2021 4:28 PM  
**To:** 'Kendelea Works'; 'Peter S. Christiansen'  
**Cc:** Moynihan Ross (ross@lesstovall.com)  
**Subject:** mayorga - motion to seal and motion for sanctions

Counsel – I am requesting an extension of time to file oppositons to the defendant's motion to seal which is due 6.10/21 and the motion for sanctions due 6/11/21. I was assisting Mr. Moynihan prepare the trial of Barcelon v. Trucking co. before Judge Navarro set to commence 6/7 – it settled 6/4 and have a family vacation scheduled between 6/11 to 6/21 outside the state of Nevada which was scheduled prior to the filing of these motions. Mr. Moynihan will be preparing for the trial of Droge v. AAAA towing in the clark co. district court commencing 7/19 and is not available to assist with the motions. I would ask to continue opp filing date to mid July, 2021. I am also concerned that the number of exhibits (1000page approx.) will takr a substantial time to review. I would appreciate a response tomorrow- ty.lms

# **EXHIBIT 2**

**Maria Hernandez**

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**From:** Kendelee Works <kworks@christiansenlaw.com> on behalf of Kendelee Works  
**Sent:** Wednesday, June 9, 2021 5:31 PM  
**To:** Les Stovall  
**Cc:** Peter S. Christiansen; Moynihan Ross  
**Subject:** Re: mayorga - motion to seal and motion for sanctions

Les,

Your request for an additional 25 days after your return from vacation to oppose these motions, both of which are due on June 10, 2021, not the 11th, is entirely unreasonable. I will also note that given your trial case settled on 6/4, I presume for the past six days you have not been preparing for trial on a case that had resolved. As to the 1000's of pages of exhibits, those documents have all already been disclosed and are primarily comprised of the LVMPD file that you indicated you were reviewing in preparation for the Bongiovi depositions last month, which then required you to continue those depositions as well. Moreover, the LVMPD file consists largely of your own client's statements to the police and the Football Leaks documents you provided to LVMPD years ago. Your request also runs afoul of the court's most recent orders extending discovery and staying certain depositions and the expert deadline.

In short, your request that we agree to afford you 7 weeks to oppose two motions for which you would be allowed 2 weeks to respond in the ordinary course, is unreasonable and not well founded. If you have a more reasonable request, we are happy to consider it and can be available for a meet and confer tomorrow.

Please let us know how you wish to proceed.

On Jun 8, 2021, at 4:27 PM, Les Stovall <les@lesstovall.com> wrote:

Counsel – I am requesting an extension of time to file oppositons to the defendant's motion to seal which is due 6.10/21 and the motion for sanctions due 6/11/21. I was assisting Mr. Moynihan prepare the trial of Barcelon v. Trucking co. before Judge Navarro set to commence 6/7 – it settled 6/4 and have a family vacation scheduled between 6/11 to 6/21 outside the state of Nevada which was scheduled prior to the filing of these motions. Mr. Moynihan will be preparing for the trial of Droge v. AAAA towing in the clark co. district court commencing 7/19 and is not available to assist with the motions. I would ask to continue opp filing date to mid July, 2021. I am also concerned that the number of exhibits (1000page approx.) will takr a substantial time to review. I would appreciate a response tomorrow-ty.lms